

PHILLIP A. TALBERT
United States Attorney
JAMES CONOLLY
ROSS PEARSON
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN VALENTIN,

Defendant.

CASE NO. 2:23-MJ-00032-JDP

STIPULATION FOR EXTENSION OF TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUSION OF TIME

DATE: March 30, 2023
TIME: 2:00 p.m.
COURT: Hon. Kendall J. Newman

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney ROSS PEARSON, and defendant EFRAIN VALENTIN, both individually and by and through his counsel of record, CHRISTOPHER COSCA, hereby stipulate as follows:

1. The Complaint in this case was filed on March 1, 2023, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on March 6, 2023. A preliminary hearing date is currently set for March 30, 2023.

2. By this stipulation, the parties jointly move for an extension of time of the preliminary hearing date to April 13, 2023, at 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure. This hearing was previously continued due to the trial schedule of defense counsel. ECF No. 11. The parties stipulate that the delay is required to allow the defense continued time for preparation, and for the government's continuing investigation of the case. The parties further agree that the interests of justice served by granting this continuance outweigh the best

interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

3. The parties agree that good cause exists for the extension of time, and that the extension of time would not adversely affect the public interest in the prompt disposition of criminal cases. Therefore, the parties request that the time between March 30, 2023, and April 13, 2023, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

IT IS SO STIPULATED.

Dated: March 28, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ ROSS PEARSON
ROSS PEARSON
Assistant United States Attorney

Dated: March 28, 2023

/s/ CHRISTOPHER COSCA
CHRISTOPHER COSCA
Counsel for Defendant
EFRAIN VALENTIN
(Authorized by email on March
28, 2023)

PHILLIP A. TALBERT
United States Attorney
JAMES CONOLLY
ROSS PEARSON
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EFRAIN VALENTIN,

Defendant.

CASE NO. 2:23-MJ-00032-JDP

FINDINGS AND ORDER EXTENDING TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUDING TIME

DATE: March 30, 2023

TIME: 2:00 p.m.

COURT: Hon. Kendall J. Newman

The Court has read and considered the Stipulation for Extension of Time for Preliminary Hearing Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on March 28, 2023.

The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order, demonstrates good cause for an extension of time for the preliminary hearing date pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure.

Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would not adversely affect the public interest in the prompt disposition of criminal cases.

THEREFORE, FOR GOOD CAUSE SHOWN:

1. The date of the preliminary hearing is extended to April 13, 2023, at 2:00 p.m., before


Magistrate Judge Carolyn K. Delaney.

2. The time between March 30, 2023, and April 13, 2023, shall be excluded from calculation pursuant to 18 U.S.C. § 3161(h)(7)(A).

3. Defendants shall appear at that date and time before the Magistrate Judge on duty.

IT IS SO ORDERED.

Dated: March 29, 2023


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE